

### **REMARKS**

The Office Action dated September 2, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-35, 37-43, and 45-59 are pending in the application. Claims 2, 4, 9, 32-34, 54, and 57-58 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter is added. Applicant submits the pending claims for consideration in view of the following.

#### **§112 Rejections, Second Paragraph**

Claims 2 and 9 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Office Action alleged that claims 2 and 9 recite “said delivering” without sufficient antecedent basis. As indicated above, claims 2 and 9 have been amended in a manner that resolves these rejections. Withdrawal of these rejections is therefore respectfully requested.

#### **§103(a) Rejections**

Claims 1-10, 14-35, 37-43, and 45-59 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 7,065,199 to Hyllander et al. (hereinafter “Hyllander”) in view of U.S. Patent 7,184,415 to Chaney et al. (hereinafter “Chaney”).

Particularly, the Office Action asserted that the combination of Hyllander and Chaney disclosed all of the elements of claims 1-10, 14-35, 37-43, and 45-59. However, this rejection is respectfully traversed as follows.

Claim 1, upon which claims 2-34 depend, is generally directed to a method that comprises receiving a temporary routing number at a user terminal and establishing a circuit-switched call leg connection from said user terminal to a packet-switched network via a circuit-switched network using said routing number. The connection is used for providing a packet-switched conference call service to said circuit-switched network. The method also includes transmitting, via a data path, a conference request directed to an application server which provides said conference call service, and receiving, via said data path, said temporary routing number as a conference routing number for a requested conference call in response to said conference request. The method further comprises using said received conference routing number to set up said circuit-switched call leg as a call leg of said conference call.

Claim 35 upon which claims 37-42 depend, is generally directed to an apparatus that includes a communicator configured to receive a temporary routing number delivered to a user terminal and an establisher configured to establish a circuit-switched call leg connection from said user terminal to a packet-switched network via a circuit-switched network using said temporary routing number, wherein said connection is used for providing a packet-switched conference call service to said circuit-switched network. The apparatus also includes a transceiver configured to transmit, via a data path, a

conference request directed to an application server which provides said conference call service. The transceiver may be configured to receive, via said data path, said temporary routing number as a conference routing number for a requested conference call in response to said conference request. The apparatus also comprises a processor configured to use said received conference routing number to set up said circuit-switched call leg as a call leg of said conference call.

Claim 43, upon which claims 45-57 depend, is generally directed to an apparatus that comprises a communicator configured to receive from a circuit-switched network, a connection request via a data path. The apparatus also includes a deliverer configured to deliver a temporary routing number to a terminal device for said circuit-switched network via said data path, where a connection from a packet switched network to a circuit-switched network is used to provide a packet-switched conference call service to said circuit-switched network, said connection request comprising a conference request, and said temporary routing number comprising a conference routing number.

Claim 54 is generally directed to a computer program embodied on a computer-readable medium. The computer program may be configured to control a processor to perform operations comprising receiving a temporary routing number at a user terminal and establishing a circuit-switched call leg connection from a user terminal to a packet-switched network via a circuit-switched network using said routing number, where said connection is used for providing a packet-switched conference call service to said circuit-switched network. The operations may also comprise transmitting, via a data path, a

conference request directed to an application server which provides said conference call service. The operations may further comprise receiving, via said data path, said temporary routing number as a conference routing number for a requested conference call in response to said conference request. Further still, the operations may comprise using said received conference routing number to set up said circuit-switched call leg as a call leg of said conference call.

Claims 55-58 recite limitations that are similar to those discussed above, though each claim has its own scope.

Each of the foregoing claims recite limitations that are not disclosed or suggested by a combination of Hyllander and Chaney.

Hyllander discloses a communication system adapted to establish connections between Internet users. The system includes a cellular radio communication network adapted to provide a short message service (SMS), and a server adapted to facilitate the establishment of a telephony/Internet connection between a mobile subscriber station of said network and an Internet user. In Hyllander, SMS is used to transfer, from the mobile subscriber station to the server, information identifying the Internet address for the Internet user and, from the server to the mobile subscriber station, information relating to the required connection between the mobile subscriber station and the Internet user.

Chaney discloses a system and method of providing a subscriber service to service users in a telecommunications network. In Chaney, networks utilizing Session Initiation Protocol (SIP) control signaling for call setup and control, the SIP REGISTER message is

modified to indicate service capability information and optionally a traffic load indication for service providers. The REGISTER message is sent to a modified Presence and Instant Messaging (PIM) server that stores presence information and the service capability information for registered service providers. Additionally, the PIM server then notifies subscribing service users of the identity of the service provider that is registered on the network. The PIM server may utilize the traffic load information to balance the traffic load between service providers by providing users with the identity of the service provider that is the most lightly loaded.

However, a combination of Hyllander and Chaney fails to disclose or suggest all the limitations of the rejected claims. For example, a combination of Hyllander and Chaney fails to disclose or suggest “receiving a temporary routing number at a user terminal; establishing a circuit-switched call leg connection from said user terminal to a packet-switched network via a circuit-switched network using said routing number, wherein said connection is used for providing a packet-switched conference call service to said circuit-switched network...and using said received conference routing number to set up said circuit-switched call leg as a call leg of said conference call,” as recited in claim 1, and as similarly recited in claims 35, 43, and 54-58.

Instead, Hyllander discloses a solution for when a GSM telephone user wishes to call to an Internet user but is unable since the user cannot address Internet users by a GSM telephone. This arises where a call is made using a GSM telephone and the user can only select digits 0 to 9, and characters “#” and “\*”. However, Internet users

addresses typically are in a format “first name.last name @operator.com,” and thus contain other characters than just digits. The solution proposed by Hyllander is to use SMS to inform the network to whom the user wishes to make a call. In the SMS, the user of the GSM phone can use all characters (a-z, 0-9, and others) and hence the user is also capable to address internet users.

Accordingly, Hyllander relates to a totally different problem and does not suggest delivering the temporary routing number in a packet-switched session establishment and using the circuit-switched call leg as a bearer for the established session. Similarly, Chaney fails to disclose the features mentioned above. Instead, Chaney discloses a system that provides access to services in a telecommunications network utilizing SIP, without disclosing the features discussed above.

Consequently, a combination of Hyllander and Chaney fails to disclose or suggest all the limitations of claim 1. Additionally, a combination of Hyllander and Chaney fails to disclose or suggest all the limitations of independent claims 35, 43, and 54-58, as these claims recite similar limitations, though each claim has its own scope. Furthermore, a combination of Hyllander and Chaney fails to disclose or suggest all the limitations of claims 2-10, 13-34, 37-42, and 45-57 for their dependency from claims 1, 35, 43, and 54-58, and for the patentable subject matter recited therein. Therefore, Applicant respectfully request that the rejection of claims 1-10, 14-35, 37-43, and 45-59 be withdrawn.

Claims 11-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 7,065,199 to Hyllander et al. (hereinafter “Hyllander”) in view of U.S. Patent 7,184,415 to Chaney et al. (hereinafter “Chaney”) as applied to claim 1 and further in view of U.S. Patent 6,731,609 to Hirni et al. (hereinafter “Hirni”). Particularly, the Office Action asserted that the combination of Hyllander, Chaney and Hirni disclosed all of the elements of claims 11-12. However, this rejection is respectfully traversed as follows.

Hyllander and Chaney were discussed above. Hirni discloses a telephony system for conducting multimedia telephonic communications across a packet-based network between a caller system and an agent system through a software switch. In Hirni, the software switch receives from the caller system a packet representing a request to conduct a multimedia telephonic conference with an agent system. Additionally, the switch exchanges packets with the caller system to establish a call with the caller system. Furthermore, the switch provides an application program interface to a telephony application program through which the telephony application program can control multimedia telephonic conferences between the caller and agent systems. The switch then processes the call according to the commands received through the application program interface from the telephony application program.

However, a combination of Hyllander, Chaney, and Hirni fails to disclose or suggest all the limitations of claims 11-12. For example, a combination of Hyllander, Chaney, and Hirni fails to disclose or suggest “receiving a temporary routing number at a

user terminal; establishing a circuit-switched call leg connection from said user terminal to a packet-switched network via a circuit-switched network using said routing number, wherein said connection is used for providing a packet-switched conference call service to said circuit-switched network...and using said received conference routing number to set up said circuit-switched call leg as a call leg of said conference call,” as recited in claim 1, from which claims 11-12 depend.

The deficiencies of Hyllander and Chaney with respect to the foregoing limitations are discussed above. Similarly, Hirni fails to disclose these limitations. Instead, Hirni discloses a system and method for providing telecommunications over a packet-based network, without discussing or disclosing the foregoing limitations.

Accordingly, Applicant respectfully submits that a combination of Hyllander, Chaney, and Hirni fails to disclose or suggest all the limitations of claims 11-12, for their dependence from claim 1, and for the patentable subject matter recited therein. Therefore, Applicant respectfully requests that the rejection of claims 11-12 be withdrawn.

### **Conclusion**


Applicant respectfully requests that the pending rejections be withdrawn. If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the



applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

  
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